

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2022-89-G**

IN RE:)	SOUTH CAROLINA DEPARTMENT OF
)	CONSUMER AFFAIRS THIRD SET OF
Application of Piedmont Natural Gas)	INTERROGATORIES AND REQUESTS
Company, Inc. for Adjustment of Rates)	FOR PRODUCTION TO PIEDMONT
<u>and Charges.</u>)	NATURAL GAS COMPANY, INC.

Pursuant to S.C. Code Ann. Regs. 103-833, the South Carolina Department of Consumer Affairs (the "Department"), by and through its undersigned counsel, hereby submits this Third Set of Interrogatories and Requests for Production to Piedmont Natural Gas Company, Inc. ("Piedmont" or "Company"). Pursuant to South Carolina Rule of Civil Procedure 26(e), and Commission regulations, each request is continuing until the time of the hearing such that the Company must promptly transmit to the Department the requested information as it becomes available.

INSTRUCTIONS

1. Responses to these requests should be provided to the undersigned, via email, within twenty (20) days of the date of service.
2. All information should be provided to the undersigned in the format requested and under oath.
3. All responses to the below requests should be labeled using the same numbers as used herein.
4. If the requested information is found in other places or in other exhibits, reference shall not be made to those, but instead, the information should be reproduced and placed in the responses to this request in the appropriate sequence.
5. All documents shall be provided in their native format, e.g., in Word, Excel, or PowerPoint format with all functions, data, and formulas intact.
6. Each request should be reproduced at the beginning of the response thereto.
7. If the response to any Request for Production of Documents is that the information requested is not currently available, please state when the information requested will become available.
8. This request shall be deemed continuing so as to require Piedmont to supplement or amend its responses as any additional information becomes available up to and through the date of hearing.
9. For any document withheld under a claim of privilege, submit a sworn or certified statement from your counsel or one of your employees in which you identify the document by author, addressee, date, number of pages, and subject matter; specify the nature and basis of the claimed privilege and the paragraph of this demand for documents to which the document is

responsive; and identify each person to whom the document or its contents, or any part thereof, has been disclosed.

10. If a refusal to respond to a Request for Production of Documents is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.

11. Answer each request on the basis of the entire knowledge of Piedmont, including information in the possession of Piedmont or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.

12. If any request cannot be answered in full, respond to the extent possible and specify the reasons for Piedmont's inability to respond.

DEFINITIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. "You," "your," and "Company" mean Piedmont or any of its affiliates, officers, directors, employees, attorneys, or agents.

2. "Application" is defined as the application filed by Piedmont Natural Gas Company, Inc. on April 1, 2022, or as otherwise revised.

3. "Company" and "Piedmont" are defined as Piedmont Natural Gas Company, Inc., its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.

4. "Workpapers" and "documents" are defined in the broadest terms and should not be construed as limited to the listed examples or limited only to items that are currently within your control or custody; include each and every original or copy of words or information generated by printing, typing, longhand, electronic recording, or other process, regardless of the form thereof, and include any kind of writing. Such documents include, but are not limited to, published materials, reports, correspondence, emails, records, memoranda, notices, notes, marginal notations, messages, teletype printouts, statements, books, studies, minutes, diagrams, drawings, maps, surveys, plans, charts, graphs, data, computer files, billings, evaluations, photographs, audio tapes, and videotapes. The terms include drafts, revisions, or amendments of any of the above, and generally, any kind of tangible, permanent records that are now, or formerly were, in your possession, custody or control, or that were known by you to exist, and that can be located or discovered by reasonably diligent efforts.

5. "Communication(s)" when used in these Requests shall include the transmittal of information by any means, written, oral, electronic, or otherwise.

6. When used in referenced to a document, "identify," identity," and "identification" mean to state the type of document (e.g., computer-stored information, microfilm, letter, memorandum, policy circular, minute book, telegram, chart, etc.), or some other means of identifying it, and its present location and custodian. If any such document was, but no longer is, in your possession or subject to your control, state what disposition was made of the document, and

if the document was destroyed or disposed of pursuant to a retention policy, please state the retention policy.

DOCUMENT AND INFORMATION REQUESTS

- 3-1 Following up on Piedmont's responses to DCA 2-5, regarding the former Anderson Manufactured Gas Plant (AMGP) site:
- a. How did Piedmont utilize the site from 1951-1988?
 - b. How did Piedmont utilize the site from 2010-2014?
 - c. Did Piedmont conduct any environmental due diligence when it acquired the site in 1951 or 2010? Please explain and provide any reports prepared for the company.
 - d. When and how did Piedmont first learn the site was contaminated?
 - e. Has Piedmont been found to be the cause of, or a contributor to, the contamination? Please explain.
 - f. Provide any Remedial Investigation Reports prepared for the site.
 - g. Provide any testimony previously submitted by Piedmont to the SC Public Service Commission or NC Utilities Commission specifically related to the contamination at the site.
- 3-2 Following up on Piedmont's responses to DCA 2-5, regarding the Huntersville Liquefied Natural Gas (HLNG) site:
- a. Admit or Deny. Piedmont buried waste filter material at the site. If denied, please explain.
 - b. Admit or Deny. Piedmont buried containers containing methyl mercaptan at the site. If denied, please explain.
 - c. Admit or Deny. The North Carolina Department of Environmental and Natural Resources (now known as the NCDEQ) found Piedmont disposed of solid and hazardous wastes at the site in violation of federal and state laws. If denied, please explain.
 - d. Admit or Deny. The site has been contaminated with Trichloroethylene (TCE) and benzene due to the activities of Piedmont. If denied, please explain.
 - e. Provide any Remedial Investigation Reports, or similar environmental assessments, prepared for the site.
 - f. Provide any Notices of Violation, Consent Orders, Administrative Orders, or similar documentation, issued to Piedmont by any state or federal environmental agencies related to Piedmont's activities at the site.
 - g. Provide any testimony previously submitted by Piedmont to the SC Public Service Commission or NC Utilities Commission specifically related to the contamination at the site.

- 3-3 Regarding the total environmental compliance costs sought for recovery in this case, how much is associated with the AMGP site and how much is associated with the HLNG site?
- 3-4 With regard to the AMGP and HLNG sites, provide the amount of costs related to remediation activities at each site that Piedmont has recovered (or has been authorized to recover) from its South Carolina customers. Please provide this information by site and year if available.

S.C. DEPARTMENT OF CONSUMER AFFAIRS



Roger Hall, Esq. (Deputy Consumer Advocate)
Carri Grube Lybarker, Esq. (Consumer Advocate)
Connor J. Parker, Esq. (Assistant Consumer Advocate)
P.O. Box 5757
Columbia, SC 29250-5757
(803) 734-4200

July 8, 2022
Columbia, South Carolina

CERTIFICATE OF SERVICE

I, Roger Hall, hereby certify that the foregoing document was served by electronic mail on all parties at the addresses listed in the Commission's official service list for Docket 2022-89-G on July 8, 2022



Roger Hall, Esq.